

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NAVIENT SOLUTIONS, LLC,

Plaintiff,

v.

**THE LAW OFFICES OF JEFFREY
LOHMAN, et al.,**

Defendants.

Case No. 19-CV-461 (LMB/TCB)

**PLAINTIFF NAVIENT SOLUTIONS, LLC’S CONSENT MOTION TO RESCHEDULE
THE HEARING ON THE PARTIES’ PRE-TRIAL MOTIONS**

Pursuant to Local Civil Rule 7 and in accordance with the Rule 16(B) Scheduling Order entered in this case (Dkt. 42), Plaintiff Navient Solutions, LLC (“NSL”), by counsel and with the consent and joinder of all parties, respectfully requests that the hearing date for oral argument on the parties’ pre-trial motions, Dkts. 448, 454, 456, 458, 460, 462, and 464, be rescheduled for August 2, 2021 at 10:00 a.m.

In support of this motion, NSL states as follows:

On July 19, 2021, NSL filed its motion in limine to preclude Defendants from making arguments or presenting evidence at trial regarding unrelated legal proceedings and to preclude the Defendants’ expert, Wayne Travell, from offering improper legal opinions (Dkt. 448). NSL noticed a hearing on the motion for Friday, July 30, 2021 (Dkt. 450). Counsel for the Defendants contacted the undersigned afterward to say that Mr. Urban and Mr. Charnoff were not available for a hearing on July 30.

That same day, Defendants filed six motions in limine (Dkts. 454, 456, 458, 460, 462, and 464) and noticed a hearing on the motions for Friday, August 6, 2021 at 10:00 a.m. (Dkt. 467).¹

By order dated July 20, 2021, the Court reset the deadlines for Defendants' motions and ordered that all pre-trial motions be heard on Friday, July 30, 2021 at 10:00 a.m. (Dkt. 468). In response, counsel for the Defendants, Mr. Urban and Mr. Charnoff, and the undersigned called chambers to notify the Court that Mr. Urban and Mr. Charnoff are unavailable for a hearing on July 30 and to request that the hearing be moved. The Court offered two possible alternatives: July 29th or August 2nd. Mr. Urban and Mr. Charnoff stated they were available for a hearing on August 2. The undersigned agreed to that date subject to Mr. Calhoun's availability and represented that, if all parties agreed to that date, he would prepare a consent motion requesting that all of their motions scheduled for hearing on July 30, 2021 be rescheduled for August 2, 2021 at 10:00 a.m. Since then, the undersigned has confirmed that Mr. Calhoun is available for a hearing on August 2, 2021 at 10:00 a.m.

Accordingly, we request that all of the parties' pending motions in limine be rescheduled for a hearing on Monday, August 2, 2021 at 10:00 a.m.

¹ Defendants also filed a motion for additional peremptory challenges (Dkt. 466), which the Court denied (Dkt. 474).

Dated: July 22, 2021

Respectfully submitted,

/s/ Jeffrey R. Hamlin

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